

IN THE UNITED STATES DISTRICT COURT
THE EASTERN DISTRICT OF PENNSYLVANIA

TONY DELGUERICO AND	:	CIVIL ACTION
LEIGH DELGUERICO	:	
	:	No.: 02-CV-3453
and	:	
	:	
DELGUERICO'S WRECKING &	:	
SALVAGE, INC.,	:	
	:	
Plaintiffs,	:	
vs.	:	
	:	
SPRINGFIELD TOWNSHIP,	:	
BUCKS COUNTY,	:	
	:	
and	:	
	:	
JEFFREY MEASE, individually and	:	
in his capacity as Code Enforcement	:	
Officer for Springfield Township,	:	
	:	
and	:	
	:	
PETER LAMANA, RODNEY WIEDER	:	
JAMES HOPKINS, ROBERT ZISKO and:	:	
CHARLES HALDERMAN, JR.,	:	
individually and in their official	:	
capacities as members of the Board	:	
of Supervisors of Springfield Township	:	
	:	
and	:	
	:	
JOHN HAMMILL and PATRICIA	:	
HAMMILL,	:	
	:	
Defendants.	:	JURY TRIAL DEMANDED

DISCLOSURE OF DEFENDANT'S JOHN AND PATRICIA HAMMILL
UNDER FEDERAL RULE OF CIVIL PROCEDURE 26 (a)(2)(b)

Defendants' John and Patricia Hammill herein respond to the Pre-trial Scheduling Order under Federal Rule of Civil Procedure 16 entered by Judge Padova on April 2, 2004.

As required by the entering of said order, and in accordance with Federal Rule of Civil Procedure 26(a)(2)(B) Defendants hereby submit their Disclosure regarding discovery as follows:

POSSIBLE WITNESSES OR PERSONS TO GIVE TESTIMONY

1. John Hammill 2845 Grouse Lane, Riegelsville, PA 18077. Mr. Hammill is a defendant named herein, and can testify to his position on and/or personal knowledge regarding the facts in this case.

2. Patricia Hammill 2845 Grouse Lane, Riegelsville, PA 18077. Mrs. Hammill is a defendant named herein, and can testify as to her position and/or personal knowledge regarding the facts in this case.

3. Bonnie Browndorf and/or Mel Browndorf 140 South Main Street, Doylestown, PA 18901. Their phone number is 215-230-9800. Bonnie Browndorf is the realtor who initially listed this property for sale for Jean Warner, the prior owner of the property in question. Mell Browndorf is her husband and partner in business. Her testimony would relate to the fair market value of the property which the

Hammill's own as far back as 1993.

4. Jean Warner resides in Stevensville, Montana, and is the prior owner of the property now owned by Mr. & Mrs Hammill. Her phone number is 406-777-5561. She has knowledge of value of the property at 2845 Grouse Road, Springfield Township when she listed it for sale in 1992/1993.

5. Tony DelGuerico 2895 Grouse Lane, Riegelsville, PA 18077. Mr. DelGuerico is the plaintiff in this action, and can testify to his position and/or personal knowledge regarding the facts in this case.

6. Leigh DelGuerico 2895 Grouse Lane, Riegelsville, PA 18077. is a plaintiff in this case and can testify to her position and/or personal knowledge regarding the facts in this case.

7. Del Guerico's Disposal Service, Inc. Is a corporation. 2895 Grouse Lane, Riegelsville, PA 18077. Defendant Corporation can testify through one of its principals or officers as to its position and/or personal knowledge regarding this case.

8. Denis Denard, Esq. Liederbach, Hahn, Foy & Petri, 892 Second Street Pike, Suite C, Richboro PA 18954-1005. Mr. Denard is an attorney who represents or represented the Zoning Hearing Board of Springfield Township during time periods relevant hereto. He can offer personal knowledge of the events relevant hereto.

9. James McNamara, Esq. McNamara, Bolla & Williams, Attorneys at Law. 122 East Court Street, Doylestown, PA 18901. (215)345-8888. Mr. McNamara is an attorney who represents or represented Springfield Township during time periods

relevant hereto. He can offer personal knowledge of the events relevant hereto.

10. David M. MacFarlan, Esq. 411 Horsham Road, Horsham, PA 19044. Mr. MacFarlan is an attorney who represents or represented DelGuerico's at times relevant hereto. He can offer testimony relating to his understanding of the facts of this case.

11. Greg Emmons, Esq. Greg B Emmons and Associates, PC., One Settlers Drive, P.O. Box 926, Doylestown, PA 18901. Mr. Emmons is an attorney who represents or represented defendants John and Patricia Hammill during time periods relevant hereto. He can offer testimony relating to the facts of this case, and his personal knowledge of the proceedings which are the alleged cause of Plaintiff's complaint..

12. Mary Eberle, Esq. Grim, Biehn & Thatcher, 6th & Chestnut Streets, Perkasie, PA 18944. Ms. Eberly is a former Solicitor for Springfield Township. She has personal knowledge of the facts and events relevant hereto.

13. Dana Guerra, is a neighbor of Defendant Hammill and of Plaintiff DelGuerico. We do not have Ms. Guerra's address. At times relevant hereto, she had direct knowledge of Plaintiff's course of conduct regarding its dealings with neighbors and with Springfield Township. She can testify to the matters relevant hereto, and to her personal knowledge of the events which occurred in this matter.

14. Springfield Township Board of Supervisors members including but not limited to the following parties. Unless an address is given below, all of these parties can be contacted and/or served at 2320 Township Road, Quakertown, PA 18951-3306,

and reached by phone at 610-346-6700:

- (a) Peter A. Lamana. Mr. Lamana is Chairman of the Board of Supervisors of Springfield Township, and as personal knowledge of the events relevant hereto.
- (b) Richard Cernok. Mr. Cernok is Chairman of the Zoning Hearing Board of Springfield Township, and has personal knowledge of the events relevant hereto.
- (c) Walter Dearden. Mr. Dearden was is a member of the Zoning Hearing Board of Springfield Township at times relevant hereto, and has personal knowledge of the events relevant hereto.
- (d) Alex Bodian. Mr. Bodian is a member of the Zoning Hearing Board of Springfield Township at times relevant hereto, and has personal knowledge of the events relevant hereto.
- (e) Barbara A. Smith. 2320 Township Road, Quakertown, PA 18951. Mrs. Smith is the Township Manager for Springfield Township at times relevant hereto. She can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.
- (f) Donald C. Kucher, 1520 Oak Lane, Quakertown, PA 18951. Mr. Kucher is a former Supervisor of Springfield Township at times relevant hereto. He can testify relating to facts relevant to subject

of this case including the nature of Defendant's contact with said Township.

- (g) Gary Alterholt, 1225 Route 212, Quakertown, PA 18951. Mr. Alterholt is a former Supervisor of Springfield Township at times relevant hereto. He can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.
- (h) Rodney Wieder, is chairman of the Springfield Township Board of Supervisors. Mr. Wieder is a Defendant hereto. He can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.
- (i) Robert Zisco, is a member of the Springfield Township Board of Supervisors at times relevant hereto. He can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.
- (j) James Hopkins, 3120 Trolley Ridge Circle, Quakertown, PA 18951. Mr. Hopkins is a defendant hereto was a member of the Springfield Township Board of Supervisors at times relevant hereto. He can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.
- (k) Charles Halderman, Jr. is a defendant hereto and is a member of

the Springfield Township Board of Supervisors at times relevant hereto. He can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.

- (l) Charles Mease, P.O. Box 328, Richlandtown, PA 18955 is a former member of the Springfield Township Board of Supervisors and has knowledge relating to facts which are the subject of this case including the nature of Defendant's contact with said Township.
- (m) Jeffrey Mease, P.O. Box 328, Richlandtown, PA 18955 Mr. Mease is a Code Enforcement Officer for Springfield Township at times relevant hereto. He can testify relating to facts relevant to subject of this case including the nature of Defendant's contact with said Township.

DOCUMENTS TO BE INTRODUCED

1. The document attached hereto labeled "H-1" is a real estate listing for the subject property presently owned by our client's John and Patricia Hammill. The document evidences that the listing price for subject property was \$498,500.00. This listing was made in 1993, as such, with appreciation in value, client's asking price in the course of this matter was in fact reasonable.

RESPECTFULLY SUBMITTED,

BY: _____
JOHN M. HELEY, ESQUIRE
Attorney for Defendants, John and
Patricia Hammill